

quinn emanuel **trial lawyers | new york**



COHEN MILSTEIN

November 29, 2021

VIA ECF

Magistrate Judge Sarah L. Cave
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Room 1670
New York, NY 10007

Re: *Iowa Pub. Emps. 'Ret. Sys. et al. v. Bank of Am. Corp. et al.*, No. 17-cv-6221 (KPF-SLC)

Dear Judge Cave:

Plaintiffs respectfully request leave to file their letter-reply in support of Plaintiffs' letter-motion for extension of time to file a response to Defendants' sur-reply (ECF 495, 498) with redactions to references to confidential material, pursuant to paragraph I.G of this Court's Individual Rules of Practice.

Plaintiffs request to file their letter-reply in redacted form as it contains references to expert materials and documents that have already been, or will be, filed under seal or in redacted form pursuant to sealing orders issued by Judge Failla and have been designated as Highly Confidential or Confidential pursuant to the Protective Order in this case (ECF 150). *See Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 120 (2d Cir. 2006) (recognizing that the Court must "balance competing considerations against [the presumption of access]," including but not limited to "the privacy interests of those resisting disclosure") (quoting *United States v. Amodeo*, 71 F.3d 1044, 1050 (2d Cir. 1995)).

Respectfully submitted,

/s/ Michael B. Eisenkraft

Michael B. Eisenkraft
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/s/ Daniel L. Brockett

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